

1 Roopal P. Luhana
CHAFFIN LUHANA LLP
2 600 Third Avenue, Floor 12
3 New York, NY 10016
4 Telephone: (888) 480-1123
5 luhana@chaffinluhana.com

6 Sarah R. London (SBN 267083)
GIRARD SHARP LLP
7 601 California St., Suite 1400
8 San Francisco, CA 94108
9 Telephone: (415) 981-4800
10 slondon@girardsharp.com

11 Rachel B. Abrams (SBN 209316)
PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP
12 555 Montgomery Street, Suite 820
13 San Francisco, CA 94111
14 Telephone: (415) 426-5641
15 rabrams@peifferwolf.com

16 *Co-Lead Counsel for Plaintiffs*

17 **IN THE UNITED STATES DISTRICT COURT**

18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

19 IN RE: UBER TECHNOLOGIES, INC.,
20 PASSENGER SEXUAL ASSAULT
21 LITIGATION

22 This Document Relates to:

23 *W.H.B. 1486 v. Uber Technologies, Inc., et al.*,
24 Case No. 24-cv-4803;

25 *A.R.2 v. Uber Technologies, Inc., et al.*,
26 Case No. 3:24-cv-07821;

27 *Dean v. Uber Technologies, Inc., et al.*,
28 Case No. 23-cv-6708;

29 *B.L. v. Uber Technologies, Inc., et al.*,
30 Case No. 2f-cv-7940;

31 *L.C.H.B. 128 v. Uber Technologies, Inc., et al.*,
32 Case No. 24-cv-7019; and

33 *W.H.B. 1876 v. Uber Technologies, Inc., et al.*
34 Case No. 24-cv-5230.

35 Case No. 3:23-md-03084-CRB (LJC)

36 STIPULATION AND ~~PROPOSED~~ ORDER
37 TO RESET DEADLINES RE: PTO NO. 26
38 AND EXPERT DEMONSTRATIVES

39 Judge: Hon. Charles R. Breyer
40 Courtroom: Courtroom 6-17th Floor

1 WHEREAS, on May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1
2 Case Assignments and Discovery Schedule;

3 WHEREAS, Pretrial Order No. 26, which required the parties to exchange expert reports by
4 August 8, 2025 and rebuttal expert reports by September 8, 2025, was modified by Stipulation and
5 Court Order to require the parties to submit expert reports by August 22, 2025, and rebuttal expert
6 reports by September 22, 2025 [ECF 3533];

7 WHEREAS, the parties agree certain fact discovery remains open for completion -- including
8 a 30(b)(6) deposition on August 21, 2025 that is necessary for expert discovery;

9 WHEREAS, the parties agree that expert deadlines should be modified such that the
10 exchange of expert reports should move from August 22, 2025 to August 29, 2025, and the
11 exchange of rebuttal expert reports should move from September 15, 2025 to September 29, 2025;

12 WHEREAS, the parties agree that extending the aforementioned deadlines will not require
13 extending any other deadlines set by Pretrial Order No. 26.

14 WHEREAS, the Court's Standing Order on Civil Jury Trials Section II(F)(1) regarding Expert
15 Witnesses provides, in relevant part: "expert reports must be complete and sufficiently detailed.
16 Illustrative animations, diagrams, charts and models may be used on direct examination only if they
17 were part to the expert's report... By written stipulation, of course, all sides may relax these
18 requirements."

19 WHEREAS, on June 3, 2025, the Parties indicated their intent to provide a stipulation
20 relaxing these requirements to the Court. ECF 3157.

21 THEREFORE, the parties respectfully request the Court enter the parties' stipulation and
22 that the following deadlines set by Pretrial Order No. 26 and modified by ECF 3533 be extended as
23 follows:

24 • The parties shall exchange expert reports by August 29, 2025.
25 • The parties shall exchange expert rebuttal reports by September 29, 2025.

1 IT IS HEREBY STIPULATED AND AGREED by the Parties that expert reports need not
2 include “[i]llustrative animations, diagrams, charts and models” for them to be used on direct
3 examination.

4

5 **IT IS SO STIPUALTED.**

6

7 DATED: August 14, 2025

Respectfully submitted,

8 By: /s/ Sarah London
9 RACHEL B. ABRAMS (Cal Bar No. 209316)
10 ADAM B. WOLF (Cal Bar No. 215914)
11 SARA B. CRAIG (Cal Bar No. 301290)
12 PEIFFER WOLF CARR KANE CONWAY
13 & WISE, LLP
14 555 Montgomery Street, Suite 820
15 San Francisco, CA 94111
16 Telephone: 415.766.3544
17 Facsimile: 415.840.9435
18 Email: rabrams@peifferwolf.com
awolf@peifferwolf.com
scraig@peifferwolf.com

19 ROOPAL P. LUHANA (*Pro Hac Vice*)
20 CHAFFIN LUHANA LLP
21 600 Third Avenue, Fl. 12
22 New York, NY 10016
23 Telephone: (888) 480-1123
24 Email: luhana@chaffinluhana.com

25 SARAH R. LONDON (SBN 267083)
26 ANDREW R. KAUFMAN (*Pro Hac Vice*)
27 GIRARD SHARP LLP
28 601 California St., Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800
Email: slondon@girardsharp.com
akaufman@girardsharp.com

29 *Co-Lead Counsel for Plaintiffs*

1 Dated: August 14, 2025

2 KIRKLAND & ELLIS LLP

3 /s/ Laura Vartain Horn4 Jessica Davidson (*Admitted Pro Hac Vice*)
jessica.davidson@kirkland.com
601 Lexington Avenue New York, NY 10022
Telephone: (212) 446-48006 Allison M. Brown (*Admitted Pro Hac Vice*)
alli.brown@kirkland.com
7 2005 Market Street, Suite 1000
8 Philadelphia, PA 19103
Telephone: (215) 268-50009
10 Laura Vartain Horn (SBN 258485)
laura.vartain@kirkland.com
11 555 California Street
12 San Francisco, CA 94104
Telephone: (415) 439-140013 *Attorneys for Defendants*
14 UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

ATTESTATION

2 Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose
3 behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

4 Dated: August 14, 2025

5 */s/ Sarah R. London*

6 SARAH R. LONDON

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1 **[PROPOSED] ORDER**
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5 **IT IS SO ORDERED.**
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8 Dated: August 15, 2025
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